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	16	Attorneys for Plaintiff Timothy Holloway
	17	UNITED STATES
	18	DISTRICT
	19	
	20	Timothy Holloway,
	21	
	22	Plaintiff,
	23	V.
	24	Plusfour, Inc., Bank of America,
	25	N.A., Discover Bank, Equifax
	26	Information Services, LLC, and Experian Information Solutions,
	20	Inc

## DISTRICT OF NEVADA

**STATES DISTRICT COURT** 

Case No.: 2:16	6-cv-02858-JCM-PAL
Time For Pla	or An Extension Of intiff To Respond To ank of America, To Dismiss
[Second Requ	iestl

CASE No.: 2:16-cv-02858-JCM-PAL

Defendants.

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Plaintiff Timothy Holloway ("Plaintiff") and Defendant Bank of America, N.A. ("Defendant") (jointly as the "Parties"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until March 27, 2017—for Plaintiff to respond to Defendant's Motion to Dismiss. ECF No. 18.

Plaintiff filed his Complaint on December 9, 2016. ECF No. 1. On January 12, 2017, Plaintiff filed his Amended Complaint. ECF No. 10. On February 13, 2017, Defendant filed its Motion to Dismiss (the "Motion"). ECF No. 18. Counsel for Plaintiff has requested in good faith and not for the purposes of delay, and Defendant has agreed, to allow Plaintiff an additional 14 days to respond to the Motion. The Parties in good faith stipulate to allow additional time for Plaintiff to respond to the Motion. This is the second request for an extension of this deadline.

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	1	THEREFORE, in consideration of the foregoing, and for good cause, the		
	2	Parties hereby stipulate and agree as follows:		
	3	(1) Plaintiff shall respond to Defendant's Motion, ECF. No. 18, on or before		
	4	March 27, 2017.		
	5			
	6	DATED this 13th day of March 2017.		
	7			
1	8	KAZEROUNI LAW GROUP, APC		
	9	By: /s/ Michael Kind		
	10	Michael Kind, Esq.		
	11	7854 W. Sahara Avenue		
AFC.	12	Las Vegas, NV 89117 Attorneys for Plaintiff		
OUP, 2 enue 117	13			
ara Av NV 89		AKERMAN LLP		
7854 W. Sahara Avenue 7854 W. Sahara Avenue Las Vegas. NV 89117 16		By: /s/ Rex Garner		
7854 7854 Las	15	Ariel E. Stern, Esq.		
KA	16	Rex Garner, Esq.		
	17	1160 Town Center Drive, Suite 330 Las Vegas, NV 89144		
	18	Attorneys for Bank of America, N.A.		
19	19	IT IS SO ORDERED:		
	20	Xellu C. Mahan		
	21	UNITED STATES DISTRICT JUDGE		
	22			
	23	DATED: March 16, 2017		
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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on March 13, 2017, the foregoing Stipulation was served via CM/ ECF to all parties appearing in this case.

## KAZEROUNI LAW GROUP, APC

By: <u>/s/ Michael Kind</u>
Michael Kind
7854 W. Sahara Avenue
Las Vegas, NV 89117